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VIA ECF AND UPS

December 4, 2023

Honorable Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, NY 10007

Re: Michael Stickler v. IBM
SDNY Case No.: 22-CV-02449 (PAC) (SLC)

12/5/2023
The request [] is granted
Michael
12/5/23

Dear Judge Crotty:

We represent Defendant IBM Corporation ("IBM") in connection with the above-referenced case. Pursuant to Rule 7 of Your Honor's Individual Practices, we write jointly on behalf of the parties to request respectfully leave to file documents under seal or with redactions, in connection with Defendant's Motion for Summary Judgment ("Motion"). The documents and information that the parties seek to seal or redact are: (i) portions of the briefing in support of or opposition to Defendant's Motion; and (ii) documents produced and portions of deposition transcripts designated as "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulation and Order for the Production and Exchange of Confidential Information (Dkt.

No. 25). The relevant documents and information fall into the following categories:

- (i) Confidential business information relating to the work Plaintiff performed during his employment with Defendant as a Software Engineer and Data Scientist. This information includes confidential research and development information, including as to competitive artificial intelligence programs and products on which Plaintiff and his team at IBM worked.